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Attorneys for Respondent - CITY OF LOS ANGELES
erroneously sued as Los Angeles Mayor's Office of Public Safety;
Los Angeles Human Relations Commission; and
Los Angeles Police Department

NO FEE – GOV'T CODE §6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Council on American-Islamic Relations-CA,
Greater Los Angeles Chapter; Vigilant Love
Coalition; Asian Americans Advancing
Justice-Los Angeles; and, American Civil
Liberties Union Foundation of Southern
California,

Petitioners,

vs.

Los Angeles Mayor's Office of Public Safety;
Los Angeles Human Relations Commission;
and, Los Angeles Police Department,

Respondents.

CASE NO. BS 174139

DECLARATION OF CARLOS A. SINGER

DATE: December 10, 2019

TIME: 130 p.m.

DEPT: 85

Complaint filed: June 28, 2018

I, Carlos Singer, declare as follows:

1. I am an attorney at law, duly licensed to practice before all courts of the State of

1 California. I am Legal Counsel to the Mayor in the office of Los Angeles Mayor Eric Garcetti.
2 I am aware of the facts stated herein of my own knowledge and, if called to testify, I could and
3 would competently do so.

4 2. I am familiar with the California Public Records Act (CPRA) request which is the
5 subject of this writ petition. In preparation for a deposition in this matter, I conducted
6 interviews of all of the document custodians then employed by the Mayor's Office. Based on
7 those interviews, I can say, on information and belief, that the document custodians who
8 participated in gathering documents are well-acquainted with the CVE program and are in the
9 best position in the Mayor's Office to know how to search for responsive records. In
10 connection with this CPRA request, I am informed and believe, and based on such information
11 and belief state that the Mayor's Office of Public Safety (MOPS) conducted a search
12 reasonably calculated to locate all records responsive to the request at issue.

13 3. I am also informed and believe that the Petitioners in this case have proposed
14 various lists of preferred search terms, ranging from over 120 search terms in one instance to
15 a revised version of approximately 38 search terms. Based on my interviews of the document
16 custodians, as well as my experience processing hundreds of document requests for this
17 office, it is my opinion that conducting a search for documents using any of the lists Petitioners
18 have proposed would produce far more results than would be necessary to locate the records
19 that are actually responsive to the request, the gravamen of which is to seek information
20 related to the development of CVE programs in Los Angeles. On that same basis, I believe
21 that a search for responsive records using the following search terms would reasonably
22 encompass the responsive records in this matter:

- 23 a. "CVE";
24 b. "Countering Violent Extremism"; and
25 c. "Extremism"
26 e. "PATHE";
27 f. "Providing Alternative to Hinder Extremism";
28 g. "RENEW";

- 1 h. Recognizing Extremist Network Early Warnings";
2 i. "MPAC";
3 j. "Muslim Public Affairs Council"; and
4 k. "Bayan"
5

6 I declare under penalty of perjury according to the laws of the State of California that the
7 foregoing is true and correct.

8 Executed on October 31, 2019 at Los Angeles, California.
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12 CARLOS A. SINGER
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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 200 No. Main Street, CHE, Suite 675, Los Angeles, CA 90012.

On November 1, 2019, I served the foregoing document described as:
DECLARATION OF CARLOS A. SINGER on the interested parties in this action addressed as follows:

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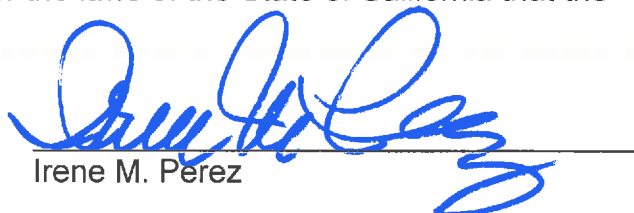
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[] BY MAIL – I am readily familiar with the practice of the Los Angeles City Attorney's Office for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is placed for collection and mailing. On the date referenced above, I placed a true copy of the above documents(s) in a sealed envelope and placed it for collection in the proper place in our office at Los Angeles, California.

[X] BY ELECTRONIC MAIL: I transmitted the document(s) to the addressee(s) via electronic mail to the addresses listed above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: November 1, 2019


Irene M. Perez